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August 28, 2023

VIA ECF

The Honorable Analisa Torres, U.S.D.J.
U.S. District Court, Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Garcia v. S&D Security and Data Inc. et al*
Case No.: 23-cv-04291

Dear Honorable Judge Torres:

This law firm represents Plaintiff Jorge Garcia (the “Plaintiff”) in the above-referenced matter. This letter is filed jointly with Defendants S&D Security and Data Inc.’s (the “Corporate Defendant”) and David Amir’s (the “Individual Defendant”, and together, the “Defendants”).

Pursuant to Your Honor’s Individual Motion Practice Rule I(C), this letter respectfully serves as a joint request to so-order the proposed stipulation, filed simultaneously herewith, extending Defendants’ deadline answer or otherwise respond to the complaint from September 7, 2023, to, through and including, October 7, 2023.

This is the second request of its nature. If granted, this request will not affect any other scheduled deadlines.

The basis for this request is that the parties are continuing to explore the possibility of an early resolution of this action. The parties are hopeful that they will be in a position to conclude their alternative dispute resolution discussions on or before October 7, 2023, thereby obviating the need for further Court intervention.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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Encl.